

1 Keith C. Owens (SBN 184841)
2 Nicholas A. Koffroth (SBN 287854)
3 **FOX ROTHSCHILD LLP**
4 10250 Constellation Blvd., Suite 900
5 Los Angeles CA 90067
6 Telephone: (310) 598-4150
7 Facsimile: (310) 556-9828
8 kowens@foxrothschild.com
9 nkoffroth@foxrothschild.com

10
11 *Counsel for the Post-Confirmation Oversight Committee,
12 as successor-in-interest to the Official Committee of Unsecured Creditors*

13
14
15 **UNITED STATES BANKRUPTCY COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17 SANTA ANA DIVISION**

18 In re:
19 THE LITIGATION PRACTICE GROUP,
20 P.C.,
21
22 Debtor.

23 Case No. 8:23-bk-10571-SC
24 Chapter 11

25
26 **JOINDER TO TRUSTEE'S REPLY IN
27 SUPPORT OF FINAL APPLICATIONS
28 FOR ALLOWANCE OF FEES AND COSTS**

29 Hearing Date & Time

30 Date: January 14, 2025
31 Time: 10:00 a.m.
32 Judge: Hon. Scott C. Clarkson
33 Ctrm: 5C – Via Zoom
34 Place: 411 West Fourth Street
35 Santa Ana, CA 92701

1 Fox Rothschild LLP (“Fox”), in its capacity as former counsel to the Official Committee of
2 Unsecured Creditors, and current counsel to its successor-in-interest, the Post-Confirmation
3 Oversight Committee (the “Committee”), in the above-captioned bankruptcy case (the “Bankruptcy
4 Case”) of The Litigation Practice Group, P.C. (the “Debtor”) filed under chapter 11 of title 11 of the
5 United States Code (the “Bankruptcy Code”),¹ hereby files this joinder (the “Joinder”) to the
6 *Trustee’s Reply in Support of Final Applications For Allowance of Fees and Costs; and Request For*
7 *Judicial Notice in Support* [Docket No. 2011] (the “Reply”) filed by Richard A. Marshack, in his
8 capacity as chapter 11 trustee in the Bankruptcy Case (the “Trustee”). The Committee files this
9 Joinder: (i) in support of *Fox Rothschild LLP’s Second and Final Application for Compensation and*
10 *Reimbursement of Expenses* [Docket No. 1897] (the “Application”);² and (ii) in response to the
11 objection [Docket No. 1972] and related addendum [Docket No. 1992] (collectively, the “Objection”)
12 filed by Greyson Law Center, PC, Han Trinh, and Jayde Trinh (collectively, the “Objecting Parties”).
13 In support of this Joinder, the Committee respectfully states as follows:

14 **I.**

15 **JOINDER**

16 The Objection raises a narrow issue—one already finally resolved by the Court—as to all
17 professionals that filed final fee applications. In the interest of conserving estate and trust resources,
18 the professionals have taken a collaborative and joint approach to the Objection in lieu of duplicative
19 reply briefs. Based on the foregoing, the Committee hereby joins in the arguments set forth by the
20 Trustee in the Reply to the Objection, with respect to the Objecting Parties’ objections to the
21 Application, and incorporates the arguments set forth in the Objection herein in full by this reference.

22 The Reply correctly notes that the only arguments set forth in the Objection pertain to
23 administrative claim reserves—an issue addressed through the confirmation process and now subject
24 to a final order that the Objecting Parties did not appeal. The Objecting Parties’ myopic attempt to
25 collaterally attack the confirmation order lays bare a key concession: ***the Objecting Parties concede***

27 ¹ Unless otherwise noted, all references to “Section” or “§” refer to a section of the Bankruptcy Code.
28 ² Unless otherwise defined herein, all capitalized terms have the definitions set forth in the Application.

1 *(by failing to contest) that the Application seeks reasonable compensation for actual and necessary*
2 *services rendered and actual and necessary expenses of Fox.* The Objection offers no criticism of
3 the fees and expenses sought by Fox in the Application. Indeed, Fox and the Application are
4 mentioned only in passing in a chart purporting to summarize all fee requests. Accordingly, to the
5 extent the Objection is overruled for the reasons set forth in the Reply, the Application should be
6 approved in its entirety and the Court should not entertain further or alternative objections to the
7 Application from the Objecting Parties.

8 **II.**

9 **CONCLUSION**

10 For the foregoing reasons, Fox respectfully requests that the Court enter an order (i) approving
11 the Application in its entirety; (ii) overruling the Objection; (iii) allowing, on a final basis,
12 (a) compensation for professional services rendered to the Committee from June 29, 2023, through
13 and including September 23, 2024, in the amount of \$1,056,669, and (b) reimbursement of expenses
14 incurred in connection with such services in the amount of \$19,939.22; (iv) authorizing and directing
15 payment to be made to Fox in the amount of \$224,912.85 in fees and \$2,517.60 in expenses, which
16 represent the fees and expenses for the Second Interim Period plus the Holdback; and (v) granting
17 Fox such other and further relief as the Court may deem just and proper.

18
19 **FOX ROTHSCHILD LLP**

20 By: /s/ Nicholas A. Koffroth
21 Keith C. Owens (Bar No. 184841)
Nicholas A. Koffroth (Bar No. 287854)

22 *Counsel for the Post-Confirmation Oversight*
23 *Committee, as successor-in-interest to the*
24 *Official Committee of Unsecured Creditors*

1 PROOF OF SERVICE OF DOCUMENT

2 I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business
3 address is 10250 Constellation Boulevard, Suite 900, Los Angeles, CA 90067.

4 A true and correct copy of the foregoing documents entitled: JOINDER TO TRUSTEE'S REPLY IN
5 SUPPORT OF FINAL APPLICATIONS FOR ALLOWANCE OF FEES AND COSTS on the judge in
6 chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

7 **1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant
8 to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and
9 hyperlink to the document. On 1/07/2025, I checked the CM/ECF docket for this bankruptcy case or
10 adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to
11 receive NEF transmission at the email addresses stated below:

- 12 • **Kyra E Andrassy** kandrassy@raineslaw.com, bclark@raineslaw.com;jfisher@raineslaw.com
- 13 • **Bradford Barnhardt** bbarnhardt@marshackhays.com,
bbarnhardt@ecf.courtdrive.com,alinares@ecf.courtdrive.com
- 14 • **Eric Bensamochan** eric@eblawfirm.us, G63723@notify.cincompass.com
- 15 • **Michael Jay Berger** michael.berger@bankruptcypower.com,
yathida.nipha@bankruptcypower.com;michael.berger@ecf.inforuptcy.com
- 16 • **Ethan J Birnberg** birnberg@portersimon.com, kdwyer@portersimon.com
- 17 • **Peter W Bowie** peter.bowie@dinsmore.com, caron.burke@dinsmore.com
- 18 • **Ronald K Brown** ron@rkbrownlaw.com
- 19 • **Christopher Celentino** christopher.celentino@dinsmore.com, caron.burke@dinsmore.com
- 20 • **Shawn M Christianson** cmcintire@buchalter.com, schristianson@buchalter.com
- 21 • **Randall Baldwin Clark** rbc@randallbclark.com
- 22 • **Leslie A Cohen** leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;clare@lesliecohenlaw.com
- 23 • **Aaron E. DE Leest** adeleest@marshackhays.com,
adeleest@marshackhays.com,alinares@ecf.courtdrive.com
- 24 • **Michael W Davis** mdavis@dtolaw.com, ygodson@dtolaw.com
- 25 • **Anthony Paul Diehl** anthony@apdlaw.net,
Diehl.AnthonyB112492@notify.bestcase.com,ecf@apdlaw.net,9143954420@filings.docketbird.com
- 26 • **Ashley Dionisio** adionisio@omniagnt.com
- 27 • **Jenny L Doling** jd@jdl.law,
dolingjr92080@notify.bestcase.com;15994@notices.nextchapterbk.com;jdoling@jubileeblk.net
- 28 • **Daniel A Edelman** dedelman@edcombs.com, courtecl@edcombs.com
- **Howard M Ehrenberg** Howard.Ehrenberg@gmlaw.com,
hehrenberg@ecf.courtdrive.com;hehrenberg@ecf.inforuptcy.com;Karen.Files@gmlaw.com;denise.walker@
gmlaw.com
- **Meredith Fahn** fahn@sbcglobal.net
- **Jeremy Faith** Jeremy@MarguliesFaithlaw.com,
Angela@MarguliesFaithLaw.com;Vicky@MarguliesFaithLaw.com;Amber@MarguliesFaithLaw.com
- **William P Fennell** william.fennell@fennelllaw.com,
wpf@ecf.courtdrive.com;hala.hammi@fennelllaw.com;naomi.cwalinski@fennelllaw.com;samantha.larimer
@fennelllaw.com;office@fennelllaw.com;Brendan.Bargmann@fennelllaw.com
- **Alan W Forsley** alan.forsley@flpllp.com, awf@fkllawfirm.com,awf@fl-lawyers.net,addy@flpllp.com
- **Marc C Forsythe** mforsythe@goeforlaw.com,
mforsythe@goeforlaw.com;dcyrankowski@goeforlaw.com;Forsythe.MarcR136526@notify.bestcase.com
- **Jeremy Freedman** jeremy.freedman@dinsmore.com, bonnie.connolly@dinsmore.com
- **Eric Gassman** erg@gassmanlawgroup.com, gassman.ericb112993@notify.bestcase.com
- **Christopher Ghio** christopher.ghio@dinsmore.com, angelica.urena@dinsmore.com
- **Amy Lynn Ginsburg** efilings@ginsburglawgroup.com
- **Eric D Goldberg** eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com

- 1 • **Jeffrey I Golden** jgolden@google.com,
2 kadele@ecf.courtdrive.com;cbmeeker@gmail.com;lbracken@wglp.com;dfitzgerald@google.com;golden.jeffre
3 yi.b117954@notify.bestcase.com
- 4 • **Richard H Golubow** rgolubow@wghlawyers.com,
5 jmartinez@wghlawyers.com;svillegas@wghlawyers.com
- 6 • **David M Goodrich** dgoodrich@google.com,
7 kadele@google.com;dfitzgerald@google.com;wgllp@ecf.courtdrive.com
- 8 • **Spencer Keith Gray** spencer.gray@dinsmore.com
- 9 • **D Edward Hays** ehays@marshackhays.com,
10 ehays@ecf.courtdrive.com;alinares@ecf.courtdrive.com;cmendoza@marshackhays.com;cmendoza@ecf.co
11 urtdrive.com
- 12 • **Alan Craig Hochheiser** ahighheiser@mauricewutscher.com, arodriguez@mauricewutscher.com
- 13 • **Garrick A Hollander** ghollander@wghlawyers.com,
14 jmartinez@wghlawyers.com;svillegas@wghlawyers.com
- 15 • **Brian L Holman** b.holman@musickpeeler.com
- 16 • **Richard L. Hyde** rhyde@awglaw.com
- 17 • **Peter L Isola** pisola@hinshawlaw.com, rmojica@hinshawlaw.com, iking@hinshawlaw.com
- 18 • **Razmig Izakelian** razmigizakelian@quinnmanuel.com
- 19 • **Sara Johnston** sara.johnston@dinsmore.com
- 20 • **Sweeney Kelly** kelly@ksgklaw.com
- 21 • **Joon M Khang** joon@khanglaw.com
- 22 • **Ira David Kharasch** ikharasch@psjlaw.com
- 23 • **Meredith King** mking@fsl.law, ssanchez@fsl.law; jwilson@fsl.law
- 24 • **Nicholas A Koffroth** nkoffroth@foxrothschild.com,
25 khoang@foxrothschild.com; ca.dkt@foxrothschild.com
- 26 • **David S Kupetz** David.Kupetz@lockelord.com, mylene.ruiz@lockelord.com
- 27 • **Christopher J Langley** chris@slclawoffice.com,
28 langleycr75251@notify.bestcase.com; ecf123@casedriver.com; john@slclawoffice.com
- **Kelli Ann Lee** Kelli.lee@dinsmore.com, kristy.allen@dinsmore.com
- **Matthew A Lesnick** matt@lesnickprince.com, matt@ecf.inforuptcy.com; jmack@lesnickprince.com
- **Daniel A Lev** daniel.lev@gmlaw.com, cheryl.caldwell@gmlaw.com; dlev@ecf.courtdrive.com
- **Britteny Leyva** bleyva@mayerbrown.com,
2396393420@filings.docketbird.com; KAWhite@mayerbrown.com; ladocket@mayerbrown.com
- **Marc A Lieberman** marc.lieberman@flpllp.com, addy@flpllp.com, andrea@flpllp.com
- **Michael D Lieberman** mlieberman@lipsonneilson.com
- **Yosina M Lissebeck** Yosina.Lissebeck@Dinsmore.com,
24 caron.burke@dinsmore.com; Wendy.Yones@Dinsmore.com
- **Mitchell B Ludwig** mbl@kpclegal.com, kad@kpclegal.com
- **Daniel S March** marchlawoffice@gmail.com, marchdr94019@notify.bestcase.com
- **Kathleen P March** kmarch@bkylawfirm.com, kmarch3@sbcglobal.net, kmarch@sbcglobal.net
- **Mark J Markus** bklawr@bklaw.com,
25 markjmarkus@gmail.com; markus.markj.r112926@notify.bestcase.com
- **Richard A Marshack (TR)** pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
- **Laila Masud** lmasud@ecf.courtdrive.com; lbuchanan@marshackhays.com; alinares@ecf.courtdrive.com
- **Sarah S. Mattingly** sarah.mattingly@dinsmore.com
- **William McCormick** Bill.McCormick@ag.tn.gov
- **Kenneth Miskin** Kenneth.M.Miskin@usdoj.gov
- **Byron Z Moldo** bmoldo@ecjlaw.com, aantonio@ecjlaw.com, dperez@ecjlaw.com
- **Glenn D. Moses** gmoses@venable.com,
26 cascavone@venable.com; ipmalcolm@venable.com; jadelgado@venable.com
- **Jamie D Mottola** Jamie.Mottola@dinsmore.com, jhanawalt@ecf.inforuptcy.com
- **Alan I Nahmias** anahmias@mbn.law, jdale@mbn.law
- **Victoria Newmark** vnewmark@psjlaw.com
- **Jacob Newsum-Bothamley** jacob.bothamley@dinsmore.com, bonnie.connolly@dinsmore.com
- **Queenie K Ng** queenie.k.ng@usdoj.gov
- **Israel Orozco** israel@iolawcorp.com

- 1 • **Keith C Owens** kowens@foxrothschild.com, khoang@foxrothschild.com
- 2 • **Lisa Patel** lpatel@lesnickprince.com, jmack@lesnickprince.com;jnavarro@lesnickprince.com
- 3 • **Michael R Pinkston** rpinkston@seyfarth.com,
jmcdermott@seyfarth.com,sfocalendar@seyfarth.com,5314522420@filings.docketbird.com,bankruptcydoc
ket@seyfarth.com
- 4 • **Douglas A Plazak** dplazak@rhlaw.com
- 5 • **Tyler Powell** tyler.powell@dinsmore.com, jennifer.pitcock@dinsmore.com;caitlin.brock@dinsmore.com
- 6 • **Daniel H Reiss** dhr@lnbyg.com, dhr@ecf.inforuptcy.com
- 7 • **Ronald N Richards** ron@ronaldrichards.com, 7206828420@filings.docketbird.com
- 8 • **Vanessa Rodriguez** vanessa.rodriguez@dinsmore.com, angelica.urena@dinsmore.com
- 9 • **Kevin Alan Rogers** krogers@wellsmar.com
- 10 • **Gregory M Salvato** gsalvato@salvatoboufadel.com,
calendar@salvatolawoffices.com;jboufadel@salvatoboufadel.com;gsalvato@ecf.inforuptcy.com
- 11 • **Olivia Scott** olivia.scott@hklaw.com
- 12 • **Jonathan Serrano** jonathan.serrano@dinsmore.com
- 13 • **Maureen J Shanahan** Mstotaro@aol.com
- 14 • **Paul R Shankman** PShankman@fortislaw.com, info@fortislaw.com
- 15 • **Zev Shechtman** Zev.Shechtman@saul.com,
zshechtman@ecf.inforuptcy.com;hannah.richmond@saul.com
- 16 • **Jeffrey M Singletary** jsingletary@swlaw.com, rmckay@swlaw.com
- 17 • **Leslie Skorheim** leslie.skorheim@usdoj.gov
- 18 • **Adam D Stein-Sapir** info@pflc.com
- 19 • **Howard Steinberg** steinbergh@gtlaw.com, pearsallt@gtlaw.com;NEF-BK@gtlaw.com;howard-
steinberg-6096@ecf.pacerpro.com
- 20 • **John H. Stephens** john.stephens@dinsmore.com, lizbeth.alonso@dinsmore.com
- 21 • **Andrew Still** astill@swlaw.com, kcollins@swlaw.com
- 22 • **Matthew J Stockl** matthew.stockl@dinsmore.com, katrice.ortiz@dinsmore.com
- 23 • **Michael R Totaro** Oebkatty@aol.com
- 24 • **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov
- 25 • **William J Wall** wwall@wall-law.com
- 26 • **Sharon Z. Weiss** sharon.weiss@bclplaw.com,
raul.morales@bclplaw.com,REC_KM_ECF_SMO@bclplaw.com
- 27 • **Johnny White** JWhite@wrslawyers.com, jlee@wrslawyers.com
- 28 • **Reina Zepeda** rzepeda@omniagnt.com

2. **SERVED BY UNITED STATES MAIL:** On 1/07/2025, I served the following persons and/or
entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and
correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed
as follows.

21 See attached for additional parties

22 3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION
OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling
23 LBR, on 1/07/2025, I served the following persons and/or entities by personal delivery, mail service, or (for
24 those who consented in writing to such service method), by facsimile transmission and/or email as follows.
25 Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will
be completed no later than 24 hours after the document is filed.

26 The Honorable Scott C. Clarkson
27 United States Bankruptcy Court, Central District of California
28 411 West Fourth Street, Suite 5130 / Courtroom 5C
 Santa Ana, CA 92701-4593

1 I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

2 1/07/2025

3 Date

Kimberly Hoang

Printed Name

/s/ Kimberly Hoang

Signature

6 **Additional Parties Served by U.S. Mail**

7 **Creditors who have the 20 largest unsecured claims**

8 Debt Validation Fund II, LLC
5075 Lower Valley Road,
9 Atglen, PA 19310

10 MC DVI Fund 1, LLC; MC
DVI Fund 2, LLC
11 598 Cottonwood Dr.,
Glenview, IL 60026

12 Validation Partners LLC
1300 Sawgrass Pkwy, Ste. 110
13 Sunrise, FL 33323

14 Marich Bein LLC
15 99 Wall Street, Ste 2669
New York, NY 10005

16 Business Centers of America
17 1100 Sir Francis Drake Blvd,
Ste 1, Kentfield, CA 94904

18 JP Morgan Chase
19 3 Park Plaza, Ste 900
Irvine, CA 92614

20 CA Franchise Tax Board
21 PO Box 942857
Sacramento, CA 94257-0511

22 Outsource Accelerator Ltd
23 City Marque Limited
24 Unit 8801-2 Bldg. 244-248
Des Voeux Rd.
Central Hong Kong

25 Collaboration Advisors
400 Dorla Court
26 Zephyr Cove, NV 89448

28 Anthem Blue Cross
PO Box 511300
Los Angeles, CA 90051-7855

1 Azevedo Solutions Groups, Inc.
2 420 Adobe Canyon Rd.
3 Kenwood, CA 95452

4 Debt Pay Pro
5 1900 E Golf Road, Suite 550
6 Schaumburg, IL 60173

7 Sharp Business Systems
8 8670 Argent St
9 Santee, CA 92071

10 Tustin Executive Center
11 1630 S Sunkist Street, Ste A
12 Anaheim, CA 92806

13 Exela Enterprise Solutions
14 2701 E. Grauwyler Road
15 Irving, TX 75061

16 Netsuite-Oracle
17 2300 Oracle Way
18 Austin, TX 78741

19 Credit Reporting Service Inc
20 548 Market St, Suite 72907
21 San Francisco, CA 94104-5401

22 Document Fulfillment Services
23 2930 Ramona Ave #100
24 Sacramento, CA 95826

25 Executive Center LLC
26 5960 South Jones Blvd
27 Las Vegas, NV 89118

28 LexisNexus
15500 B Rockfield Blvd
Irvine, CA 92618

22 **Secured Creditors**

23 Diverse Capital LLC
323 Sunny Isles Blvd., Suite 503
24 Sunny Isles, FL 33154

25 City Capital NY
1135 Kane Concourse
26 Bay Harbour Islands, FL 33154